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12 Attorneys for Plaintiffs/Counterdefendants

13 UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA
15

16 ALLSTATE INSURANCE COMPANY,
17 ALLSTATE PROPERTY & CASUALTY
INSURANCE COMPANY, ALLSTATE
18 INDEMNITY COMPANY, and ALLSTATE
FIRE & CASUALTY INSURANCE
19 COMPANY,

20 Plaintiffs,

21 v.

22 RUSSELL J. SHAH, MD, DIPTI R. SHAH,
MD, RUSSELL J. SHAH, MD, LTD., DIPTI
23 R. SHAH, MD, LTD., and RADAR
MEDICAL GROUP, LLP dba UNIVERSITY
24 URGENT CARE, DOES 1-100, and ROES
101-200,

25 Defendants.

26 AND RELATED CLAIMS
27
28

CASE NO. 2:15-cv-01786-APG-CWH

STIPULATION TO INCLUDE NEVADA
INJURY ATTORNEYS DBA POWELL
LAW FIRM INTO THE STIPULATED
CONFIDENTIALITY AND PROTECTIVE
ORDER (ECF NO. 39) FOR THE
DISCLOSURE OF DOCUMENTS
PURSUANT TO F.R.C.P. 45 SUBPOENA

1 Plaintiffs/Counter-defendants ALLSTATE INSURANCE COMPANY, ALLSTATE
2 PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY,
3 and ALLSTATE FIRE & CASUALTY COMPANY (collectively referred to as the "Plaintiffs"), and
4 NEVADA INJURY ATTORNEYS DBA POWELL LAW FIRM (non-party herein after referred to as
5 "NIA") hereby stipulate and agree as follows:

6 1. Plaintiffs served NIA with a subpoena pursuant to F.R.C.P. 45 for the production of
7 documents regarding communications and payments made by and between Law Firm and the
8 Defendants during NIA's representation of certain clients in personal injury claims for which
9 Plaintiffs paid on settlement on behalf of Plaintiffs' insureds.

10 2. NIA is aware that Plaintiffs have subpoenaed several law firms seeking the same type
11 of information pursuant to Rule 45 in this case, as well as a companion sister-lawsuit *Allstate v.*
12 *Belsky, et. al. Case No. 2:15-cv-00065-MMD-CWH ("Belsky")*.

13 3. NIA understands that this Court presides over both the instant matter as well as the
14 *Belsky* matter, and that this Court has ruled consistently in both these cases and ordered other law
15 firms to produce the same type of documents request of NIA.

16 4. A stipulated confidentiality and protective order in this case entered between Plaintiffs
17 and Defendants for the disclosure of confidential, sensitive or other protected information was
18 approved by this Court on May 20, 2016. (ECF No. 39).

19 5. NIA was not a party to the stipulated confidentiality and protective order. (ECF No.
20 39).

21 6. In ordering compliance with Plaintiffs' subpoenas to other law firms, this Court also
22 ordered that the confidentiality and protective order (ECF No. 39) be applied to those law firms.

23 7. In accordance with this Court's prior rulings both in this action and in the *Belsky*
24 matter, the parties hereby stipulate and agree that the protections and scope articulated in the
25 Stipulated Confidentiality and Protective Order approved by this Court on May 20, 2016. (ECF No.
26 39) be extended in their entirety to cover NIA in its compliance with Plaintiffs' subpoena.

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1 8. NIA will produce all documents responsive to the subpoena within ten (10) days of
2 approval and entry of this Order by the Court.


3 IT IS SO STIPULATED.

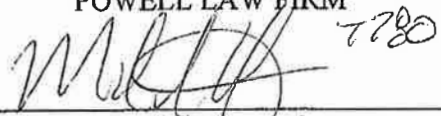
4 Dated:

Dated:

5 MCCORMICK, BARSTOW, SHEPPARD,
6 WAYTE & CARRUTH LLP

NEVADA INJURY ATTORNEYS DBA
POWELL LAW FIRM

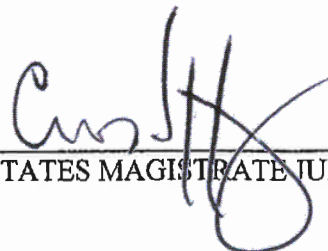
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Michael Kristof

11 **ORDER**

12 IT IS SO ORDERED.

13 DATED this 14 day of January, 2019.

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17 UNITED STATES MAGISTRATE JUDGE

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